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IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

CASE NO. 17-13797

Chapter 9

HEALTHCARE CONGLOMERATE
ASSOCIATES, LLC,

Plaintiff,

v.

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER; DOES 1 through
20,

Defendants.

Adv. No.: 17-01095

DC NO.: OHS-1

**STIPULATION TO CONTINUE HEARING
AND RESPONSE DATE ON MOTION
FOR REMAND OF LAWSUIT TO STATE
COURT PURSUANT TO 28 U.S.C. §
1452(b); AND ORDER THEREON**

IT IS HEREBY STIPULATED AND AGREED by and between Healthcare
Conglomerate Associates, LLC and Tulare Local Healthcare District, by counsel, as
follows.

RECEIVED

March 21, 2018

CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
0006244584

Hearing and Response Date re Motion
to State Court and Order Thereon

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00174319-gaa-03.21.2018

1 1. On December 28, 2017 Tulare Local Healthcare District removed to this
2 court an action ("Removed Action") that had been filed in the Superior Court for the
3 County of Los Angeles.

4 2. On January 24, 2018 Healthcare Conglomerate Associates, LLC filed a
5 Motion for Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b), D.C. No.
6 OHS-1, which is presently set for hearing on March 12, 2018 at 10:30 a.m.

7 3. On January 29, 2018 Healthcare Conglomerate Associates, LLC filed a
8 Motion to Dismiss Counterclaim Against HCCA or in the Alternative Strike Portions
9 Thereof, D.C. No. OHS-2, and Motion to Strike Portions of Answer of Tulare Local
10 Healthcare District dba Tulare Regional Medical Center, D.C. No. OHS-3, which are
11 now each set for hearing on April 5, 2018 at 11:00 a.m.

12 4. The parties have discussed these matters and agree that the hearing on
13 the Motion to Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b) will be
14 continued to April 12, 2018 at 9:30 a.m. in Fresno Tulare Local Healthcare District's
15 response to such Motion shall be due on March 29, 2018 and the reply of Healthcare
16 Conglomerate Associates, LLC shall be due April 5, 2018.

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1 5. The parties stipulate and agree to entry of a court order approving this
2 stipulation.

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4 IT IS SO STIPULATED.

5 KLEIN, DeNATALE, GOLDNER, ROSENLIB
6 & KIMBALL LLP; and

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 By: 

9 Hagop T. Bedoyan,
10 Marc A. Levinson, Attorneys for
Healthcare Conglomerate Associates, LLC

11
12 WALTER WILHELM LAW GROUP

13 By: 

14 Riley C. Walter, Attorneys for
15 Tulare Local Healthcare District

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25 Dated: Mar 22, 2018

By the Court

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27 René Lastreto II, Judge
28 United States Bankruptcy Court